

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Alex Spiro (appearance *pro hac vice*)  
2 alexspiro@quinnemanuel.com  
51 Madison Ave., 22nd Floor  
3 New York, NY 10010  
Telephone: (212) 849-7000

4 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
Daniel C. Posner (CA Bar No. 232009)  
danposner@quinnemanuel.com  
6 Mari F. Henderson (CA Bar No. 307693)  
marihenderson@quinnemanuel.com  
7 865 S. Figueroa St., 10th Floor  
Los Angeles, California 90017  
8 Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

9 QUINN EMANUEL URQUHART & SULLIVAN, LLP  
10 Asher Griffin (appearance *pro hac vice*)  
ashergriffin@quinnemanuel.com  
11 300 W. 6th St., Suite 2010  
Austin, TX 78701  
12 Telephone: (737) 667-6100

13 *Attorneys for Defendant Tesla, Inc.*

14  
15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION  
18

19 OWEN DIAZ,  
20 Plaintiff,  
21 v.  
22 TESLA, INC. d/b/a TESLA MOTORS, INC.,  
23 Defendant.

Case No. 3:17-cv-06748-WHO

**[PROPOSED] ORDER GRANTING  
DEFENDANT TESLA, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
VAUGHN DOCUMENTS AND TESLA'S  
RESPONSE TO PLAINTIFF'S NOTICE  
OF NEW EVIDENCE UNDER SEAL**

Judge: Hon. William H. Orrick

**PROPOSED ORDER**

Pursuant to Civil Local Rules 7-11 and 79-5 of the Northern District of California, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Defendant Tesla, Inc. dba Tesla Motors, Inc. ("Tesla"), has filed an Administrative Motion to File the *Vaughn* Documents and Tesla's Response to Plaintiff's Notice of New Evidence Under Seal. Having considered the Administrative Motion, the pleadings on file, and all other relevant materials, the Motion is hereby GRANTED.

IT IS HEREBY ORDERED that the following materials shall be maintained under seal:

| Document   | Portion to be Sealed  | Basis for Sealing   |
|--|---|---|
| Defendant's Response to Plaintiff's Notice of New Evidence | The following page and line numbers:<br><br>1:6-7; 1:10-13; 1:18-19; 2:4-8; 3:15; 3:18-4:12; 4:16-19; 4:27-5:1. | Discusses, describes, and pertains to Exhibits marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations. |
| Posner Decl. Ex. A - TSLA(VGN)26869                        | All   | Marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations.  |
| Posner Decl. Ex. B - TSLA(VGN)27092                        | All   | Marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations.  |

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|----------------------------------|--|-----|--|
| 1<br>2<br>3<br>4<br>5            | Posner Decl. Ex. C -<br>TSLA(VGN)27095 | All | Marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations. |
| 6<br>7<br>8<br>9<br>10           | Posner Decl. Ex. D -<br>TSLA(VGN)26870 | All | Marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations. |
| 11<br>12<br>13<br>14<br>15<br>16 | Posner Decl. Ex. E -<br>TSLA(VGN)27094 | All | Marked confidential pursuant to <i>Vaughn v. Tesla</i> protective order. Also reveals internal confidential messages related to employee misconduct and to sensitive investigations regarding the same matters, which could harm Tesla by disclosing its internal tools for conducting investigations. |

**IT IS SO ORDERED.**

DATED: August 15, 2023

By: \_\_\_\_\_  
The Hon. William H. Orrick  
U.S. District Court, Northern District of California